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8 Attorney for Plaintiff

9 Michael Grecco Productions, Inc.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MICHAEL GRECCO  
PRODUCTIONS, INC.,

Plaintiff,

v.

TIKTOK, INC.,

Defendant.

Civil Action No. 2:24-cv-04837-FLA-  
MAR

**PLAINTIFF'S NOTICE OF  
MOTION AND MOTION FOR  
LEAVE TO APPEAR  
TELEPHONICALLY FOR THE  
MOTION FOR EXTENSION OF  
DEADLINES HEARING**

DATE: Wednesday, May 14, 2025

TIME: 11:00 a.m.

JUDGE: Honorable Margo A. Rocconi

PLEASE TAKE NOTICE that, plaintiff Michael Grecco Productions, Inc.

1 (“Plaintiff”) hereby moves this Court for permission to appear telephonically or  
2 via Zoom at the Motion for Extension of Deadlines Hearing (the “Motion  
3 Hearing”) on May 14, 2025 at 11:00 a.m. and states as follows:  
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5 1. On June 7, 2024, Plaintiff filed its Complaint in this action. See D.E.

6 2. On August 15, 2024, Plaintiff filed its First Amended Complaint. See  
7 D.E. 23.

8 3. On August 29, 2024, Defendant filed its Motion to Dismiss. See D.E.  
9 24.

10 4. On October 23, 2024, the Court entered a Scheduling and Trial Order.  
11 See D.E. 42.

12 5. On March 12, 2024, the Court granted Defendant’s Motion to Dismiss  
13 without prejudice and with leave for Plaintiff to file a Second Amended Complaint.  
14 See D.E. 45.

15 6. On April 1, 2025, Plaintiff filed its Second Amended Complaint. See  
16 D.E. 46.

17 7. On April 29, 2025, Defendant filed its Answer and its Affirmative  
18 Defenses to the Second Amended Complaint. See D.E. 46

19 8. Because undersigned counsel resides in Southern Florida, request is  
20 hereby respectfully made that the Motion Hearing proceed telephonically or via  
21 Zoom to accommodate undersigned counsel’s current calendar and preexisting  
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1 professional obligations/hearings.

2 9. As such, undersigned counsel respectfully asks that the hearing  
3 proceed via telephone or Zoom to minimize additional expense and accommodate  
4 counsel's schedule.  
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6 WHEREFORE, Plaintiff respectfully requests that the Court enter an Order:  
7 (a) granting this motion and (b) allowing Plaintiff's counsel to attend the May 14,  
8 2025, Motion Hearing via Zoom, telephonically, or some other remote means.  
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10 **LOCAL RULE 7.3 CERTIFICATE**

11 Before filing this Request, undersigned counsel conferred with counsel for  
12 Defendant (Connor J. Hansen, Esq.) who indicated that he does not oppose the  
13 requested relief.  
14

15 Dated: May 6, 2025.

16 By: /s/ Lauren M. Hausman  
17 Lauren M. Hausman, Esq.  
18 Jonathan Alejandrino, Esq. (*pro hac vice*)  
19 Attorney for Plaintiff  
20 Michael Grecco Productions, Inc.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 6, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

/s/ Lauren M. Hausman  
Lauren M. Hausman, Esq.